

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 18 U.S.C. § 1343 - Wire Fraud
 26 U.S.C. § 7201 - Tax Evasion

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: 18 U.S.C. § 1343 - Wire Fraud: Imprisonment: 20 years,
 Fine: \$250,000, Supervised Release: 3 years, Special
 Assessment: \$100 - 26 U.S.C. § 7201 - Tax Evasion: Imprisonment:
 5 years, Fine: \$250,000, Supervised Release: 3 years, Special
 Assessment: \$100

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

IGOR PURLANTOV

DISTRICT COURT NUMBER

CR11-00371

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☒ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

MAUREEN BESSETTE, AUSA

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

E-filing

MELINDA HAAG (CABN 132612)
United States Attorney

FILED

JUN - 9 2011

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CR11-00371

SBA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IGOR PURLANTOV a/k/a Igor Purlantof,

Defendant.

No.

VIOLATIONS: 18 U.S.C. § 1343 – Wire
Fraud; 26 U.S.C. § 7201 – Tax Evasion

OAKLAND VENUE

INFORMATION

The United States Attorney charges:

BACKGROUND

At all times relevant to this Information:

1. From at least 1984 through October 29, 2004, an individual known to the grand jury by the initials "M.D." resided in the Northern District of California. From 1983 through at least June 2005, M.D. held a bank account in his name at HSBC in Geneva, Switzerland ("HSBC account").

2. On October 29, 2004, M.D. died, leaving a substantial estate, including over \$3 million dollars in the HSBC account.

3. After October 29, 2004, HSBC received bank documents with M.D.'s forged signature requesting that HSBC add defendant IGOR PURLANTOV to M.D.'s HSBC account.

SCHEME TO DEFRAUD

1 4. Beginning in or about October 2004, and continuing through in or about February
2 2006, in the Northern District of California and elsewhere, defendant

3 IGOR PURLANTOV,

4 did knowingly and intentionally engage in an illegal scheme to defraud M.D.'s beneficiaries of
5 monies held in M.D.'s HSBC account in Geneva, Switzerland, through the use of wires, in
6 violation of Title 18, United States Code, Section 1343.

7 5. As part of the scheme to defraud, during the time period October 2004 through
8 February 2006,

9 a. PURLANTOV forged and caused to be forged M.D.'s signature on the HSBC bank
10 documents. Thereafter, PURLANTOV and others mailed and caused to be mailed the forged
11 HSBC documents to HSBC, directing HSBC to add PURLANTOV to M.D.'s HSBC account as
12 a joint account holder.

13 b. PURLANTOV directed HSBC to wire money from M.D.'s HSBC account in Geneva,
14 Switzerland, to PURLANTOV's bank accounts in London, England. HSBC wired money from
15 M.D.'s HSBC bank account to PURLANTOV'S bank accounts in London.

16
17 COUNT ONE: (18 U.S.C. § 1343 - Wire Fraud)

18 6. Paragraphs 1 through 5 of this Information are hereby re-alleged and incorporated by
19 reference as if set forth in full herein.

20 7. On or about January 10, 2005, in the Northern District of California and elsewhere, for
21 the purpose of executing a scheme and artifice to defraud as to a material matter, and for
22 obtaining money and property by means of materially false and fraudulent pretenses,
23 representations, promises, and omissions, the defendant

24 IGOR PURLANTOV,

25 did knowingly transmit and cause to be transmitted a foreign wire from HSBC in Geneva,
26 Switzerland, to defendant's bank account at Citibank London in the amount of Great British
27 Pound 229,000, in interstate and foreign commerce. All in violation of Title 18, United States
28 Code, Section 1343.

COUNT TWO: (26 U.S.C. § 7201 - Income Tax Evasion)

8. Paragraphs 1 through 5 of this Information are hereby re-alleged and incorporated by reference as if set forth in full herein.

9. During the calendar year 2005, defendant IGOR PURLANTOV had received taxable income in the approximate sum of \$1,186,087, and upon this taxable income there was a tax due and owing to the United States of America in an amount greater than defendant reported for calendar year 2005; well knowing and believing the existence of a tax deficiency for calendar year 2005, on or about April 17, 2006, in the Northern District of California, the defendant

IGOR PURLANTOV,

did willfully attempt to evade and defeat the said income tax due and owing by him to the United States of America for said calendar year, by willfully failing to submit a U.S. Individual Income Tax Return, Form 1040, as required by law, to any proper officer of the Internal Revenue Service, by failing to pay to the Internal Revenue Service said income tax, and by, among other things: (1) causing money stolen from victim M.D.'s HSBC account in Geneva, Switzerland, to be wired to defendant's London bank accounts; (2) transferring this money from his London bank accounts to defendant's New York bank accounts in two separate transactions on the same day, each separate transaction in an amount less than \$10,000 but both transactions totaling over \$10,000; and (3) willfully failing to file his tax return for the tax year ending 2005, despite a lengthy history of filing his tax returns, all in violation of Title 26, United States Code, Section 7201.

DATED: *June 8, 2011*

MELINDA HAAG
United States Attorney

[Signature]
MIRANDA KANE
Assistant United States Attorney

(Approved as to form: *[Signature]*)

AUSA BESSETTE